Monroe Energy, L.L.C.
4101 Post Road
Trainer, PA 19061
(610) 364-8000

March 13, 2013

Via FedEx #8015 3217 8660

James Rebarchak
Commonwealth of Pennsylvania
Department of Environmental Protection
2 East Main Street
Norristown, PA 19401

Re: Monroe Energy, LLC – Trainer Refinery
40 CFR 63, Subpart CC: Semi-Annual Periodic Report
Reporting Period: July 15, 2012 – January 15, 2013

Dear Mr. Rebarchak:

In accordance with 40 CFR 63, Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries, section 63.655(g), the Trainer Refinery hereby submits the enclosed Semi-Annual Periodic Report for the six month period ending January 15, 2013.

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Should you have any questions or comments regarding this report, please contact Matt Torell, Environmental Leader, at (610) 364-8399.

Sincerely,

Jeffrey K. Warmann
CEO & President

Enclosure

cc: Matt Torell (Monroe)

U.S. EPA, Region III
Office of Air Enforcement & Compliance Assistance
Mail Code 3AP20
1650 Arch Street
Philadelphia, Pa 19103-2029
(Via FedEx #8015 3217 8670)

MONROE ENERGY, LLC
TRAINER REFNERY

SEMIANNUAL PERIODIC REPORT

The Refinery MACT emission standards (40 CFR 63, Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries) regulate the following refinery equipment and operations:

1. Miscellaneous process vents.
2. Storage vessels.
3. Wastewater treatment operations.
4. Fugitive emissions.
5. Gasoline loading racks.
6. Marine loading facilities (if contiguous to the refinery).
7. Heat exchanger systems.

This semiannual report addresses the status of facility compliance with Subpart CC.

COMPLIANCE STATUS: 40 CFR 63, SUBPART CC

1. Miscellaneous process vents: [§63. 643-645]

The Trainer Refinery has one Group 1 miscellaneous process vent that is located in the Alky Pretreat Unit and is designated as the "Oxidizer Disulfide Separator Vent" (Source ID 129). The vent is routed to the FCC CO Boiler, where it is introduced into the flame zone for destruction. Per §63.644(a)(3), this vent is exempt from continuous monitoring.

Per §63.644(c)(2), all bypass valves are in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection is made monthly to ensure that the valves are maintained in the closed position. The vent was not bypassed to the atmosphere during this reporting period.

2. Storage vessels: [§63.646]

Inspection of storage tanks that are subject to the Refinery MACT regulations have been conducted in accordance with applicable requirements. No seal gap deficiencies were observed for the tanks inspected during this reporting period.

Pre-notification letters with an inspection schedule were submitted to U.S. EPA and PADEP for all the MACT affected tanks that were inspected during the reporting period. New primary seals and secondary seals were installed on Tanks 93 and 94 during the API 653 inspections. Hard copies of these records are stored onsite at the refinery.

Pressure control valves on Spheroid Tanks 501 and 502 vent to a closed loop system that is routed to the Main Flare, and the pressure control valve from Tank 513 is vented to the Lowline compressor system.

A list of Refinery MACT affected storage tanks at the Facility, including tank number, group designation and method of compliance for each tank is presented below.

Tank Number	Group Designation	Method of Compliance
66	1	External Floating Roof
67	1	External Floating Roof
132	1	Internal Floating Roof
151	1	External Floating Roof
152	1	Internal Floating Roof
155	2[1]	Internal Floating Roof
156	1	External Floating Roof
159	1	External Floating Roof
161	1	External Floating Roof
168	1	Internal Floating Roof
171	1	Internal Floating Roof
501	1	Spheroid Tank, 29.7 psia, vented to flare
502	1	Spheroid Tank, 29.7 psia, vented to flare
513	1	Spheroid Tank, 29.7 psia, vented to Lowline
54	2	HAP < 4 wt %
55	2	HAP < 4 wt %
56	2	HAP < 4 wt %
62	2	Size < 177 cubic meters
63	2	Size < 177 cubic meters
83	2	Size < 177 cubic meters
84	2	Size < 177 cubic meters
312	2	Size < 177 cubic meters
313	2	Size < 177 cubic meters
95	2	HAP < 4 wt %
96	2	HAP < 4 wt %
143	2	Max TVP <10.4 kPa, HAP < 4%
144	2	Max TVP <10.4 kPa, HAP < 4%
145	2	Max TVP <10.4 kPa, HAP < 4%
146	2	Max TVP <10.4 kPa
147	2	Max TVP <10.4 kPa
148	2	Max TVP <10.4 kPa
153	2	Max TVP <10.4 kPa
157	2	Max TVP <10.4 kPa, HAP < 4%
158	2	Max TVP <10.4 kPa, HAP < 4%
162	1	External Floating Roof

[1] This tank's service was changed to Group 2 (Max TVP < 10.4 kPa, HAP < 4%).

Tank Number	Group Designation	Method of Compliance
163	1	External Floating Roof
164	1	External Floating Roof
165	1	External Floating Roof
166	1	External Floating Roof
169	2	Max. TVP <10.4 kilopascals
172	2	Max. TVP <10.4 kilopascals
173	2	HAP < 4 wt %
174	2	HAP < 4 wt %
175	2	HAP < 4 wt %
176	2	HAP < 4 wt %
178	1	External Floating Roof
181	2	HAP < 4 wt %
182	2	HAP < 4 wt %
185	2	HAP < 4 wt %
186	2	HAP < 4 wt %
33T1	2	Size < 177 cubic meters
81TK1	2	Size < 177m^3, Max TVP < 10.4 kPa
82TK1	2	Size < 177m^3, Max TVP < 10.4 kPa

3. Wastewater Provisions: **[§63.647]**

Pursuant to 40 CFR §63.647, the Trainer Refinery complies with the Wastewater Provisions of 40 CFR 63, Subpart CC by complying with 40 CFR 61, Subpart FF, Benzene Waste Operations NESHAP.

4. Equipment Leak Standards: **[§63.648]**

Periodic equipment leak reports are submitted semi-annually in accordance with §63.10(a)(6) and §63.655(d).

5. Gasoline Loading Rack Provisions: **[§63.650]**

There is no gasoline loading rack present at the Trainer Refinery.

6. Marine Tank Vessel Loading Operation Provisions: **[§63.651]**

The Marine Tank Vessel Loading Operations present at the Trainer Refinery are not subject to 40 CFR §63.651.

7. Heat Exchange System: **[§63.654]**

The Trainer Refinery is subjected to the heat exchanger systems requirements that took effect in October of 2012. The information required pursuant to §63.655(g)(9) is summarized in Tables 1 & 2 below:

Table 1: §63.655(g)(9) Data Request Questions

The number of heat exchange systems in HAP service as of the close of the Reporting Period:	5
The number of heat exchange systems in HAP service found to be leaking:	2
A summary of the monitoring data that indicate a leak, including the number of leaks determined to be equal to or greater than the leak definitions specified in §63.654(c)(2):	See Table 2
If applicable, the date a leak was identified, the date the source of the leak was identified, and the date of repair:	See Table 2
If applicable, a summary of each delayed repair, including the original date and reason for the delay and the date of repair, if repaired during the reporting period:	N/A – No Delayed Repairs
If applicable, an estimate of VOC emissions for each delayed repair over the reporting period:	N/A – No Delayed Repairs

Table 2: Modified El Paso Monitoring Leaks and Repairs Summary

Monroe Energy - Modified El Paso Monitoring Leaks and Repairs Summary						
Monthly Sample Location	**Monthly Sample Date**	**Monthly Sample Result (ppm)**	**Leak Source**	**Leak Reading (ppm)**	**Leaking Exchanger Verification Date**	**Repair Date**
MHGB-9	10/27/2012	103	PV-7761	7.6	11/1/2012	11/07/2012
MHGB-9	10/27/2012	103	PV-7929	11.84	11/1/2012	11/15/2012
MHGB-9	10/27/2012	103	PV-7760	6.49	11/13/2012	11/14/2012
MHGB-9	11/7/2012	92	PV-7851	18.7	11/21/2012	12/10/2012
SSCT-01	11/21/2012	36	21-E-26	8.5	12/14/2012	12/29/2012

8. Start-up, Shutdown, and Malfunction Plans (SSMP): [§63.10(d)(5)]

All startups, shutdowns, and malfunctions of equipment regulated by 40 CFR 63, Subpart CC which occurred during the reporting period were managed consistent with the facility's SSMP.